

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
v.)
ALBERTO RUIZ (Deft. #3))

) No. 3:12 - 00075
JUDGE HAYNES

**ALBERTO RUIZ'S MOTION TO CONTINUE TRIAL DATE AND
PRETRIAL FILING DEADLINES**

Comes the Defendant, by and through counsel, and hereby moves this Honorable Court for an ORDER continuing the pretrial motion deadline and the jury trial, currently scheduled for August 6, 2013. In support of this Motion, the defendant would show as follows:

1. On April 18, 2012, the United States Grand Jury returned the above referenced indictment, alleging violations of 21 U.S.C. §§ 841(a)(1) and 846.

2. However, the above referenced defendant, Alberto Ruiz, was not served with said indictment until May 23, 2013, on which date he entered a formal plea of not guilty. At the time of arraignment, undersigned counsel was appointed to represent Mr. Ruiz.

3. Undersigned counsel has not completed his investigation into this matter. Defense counsel continues to review and investigate discovery materials and other evidence, and discuss these materials with Ruiz.

4. Counsel for Ruiz is unable to formulate an effective defense strategy against the allegations in the indictment until all the discovery and other evidence is thoroughly reviewed and analyzed and until his own investigation has been completed.